REMARKS

Several editorial corrections have been made to the specification. Claims 1 - 5, 12, and 15 - 16 have been amended. Claims 17 - 39 have been added. No new matter has been introduced with these corrections, amendments, or added claims, all of which are supported in the specification as originally filed. Claims 1 - 39 are now in the application.

I.   Drawing Correction

A proposed drawing correction is submitted herewith for Fig. 8, adding a missing reference number 830, as discussed above in "Amendments to the Drawings". No new matter is introduced with this proposed correction, which is supported in the specification as originally filed.

II.   Objection to the Title

Paragraph 2 of the Office Action dated March 29, 2004 (hereinafter, "the Office Action") states that the Title of the invention is not descriptive. Applicants have amended their independent Claims 1, 15, and 16 herein to more clearly specify that the "rules for organizing electronic objects" are rules for organizing those objects "according to relationships". Applicants' independent claims specify "rendering a view of the organized electronic objects" (emphasis added), where those objects are organized using "rules for organizing electronic objects according to relationships" (emphasis added). Therefore, Applicants respectfully submit that the Title of their invention, "Relational View of Electronic Objects", is in fact descriptive of these

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claims, and the Examiner is respectfully requested to withdraw this objection.

III.   Rejection under 35 U.S.C. §102

Paragraph 4 of the Office Action states that Claims 1 - 16 are rejected under 35 U.S.C. §102(b) as being anticipated by U. S. Patent 5,884,321 to Meffert. This rejection is respectfully traversed.

Applicants' independent Claim 1 specifies that "rules for organizing electronic objects according to relationships" are obtained and applied "against a plurality of electronic objects, yielding organized electronic objects", and "a view of the organized electronic objects" is then rendered. Meffert fails to teach these limitations, as will now be described.

In Meffert, data in a database has some pre-existing organization based on the underlying database table definition. Separately-stored electronic documents (referred to also in Meffert as document images) exist. Meffert teaches creating links between entries in the already-organized database and the separately-stored electronic documents. Meffert further teaches that users can define views into the database, and responsive to one of these views, a query executes against the database and thereby retrieves some entries from the database. Because links have been created between database entries and the separately-stored documents, the separately-stored documents linked to the retrieved database entries can also be retrieved. (See col. 2, lines 48 - 64.)

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However, issuing a <u>query</u> against <u>already-organized</u> tables of a database (as taught by Meffert) is distinct from Applicants' claim language of "applying ... organizing rules against a plurality of electronic objects, yielding organized electronic objects". Furthermore, Meffert has no teaching of "applying ... organizing rules against ..." the separately-stored electronic documents, thereby "yielding organized electronic objects", which is the claim language of Applicants' independent claims. Thus, neither Meffert's database tables nor his separately-stored electronic documents meet limitations of Applicants' independent claims.

The rendered view created by Meffert shows a subset of entries (i.e., those entries matching the issued query) from the <u>previously-organized</u> database tables, and electronic documents linked to those entries, where these separately-stored electronic documents are selected in reliance on their links to the database entries that satisfy the issued query. However, this is distinct from Applicants' claim language, which specifies applying the ... <u>organizing rules</u>" (emphasis added) and then "rendering a view of the <u>organized</u> electronic objects" (emphasis added) resulting therefrom.

With reference to Applicants' Claims 15 and 16, these claims also specify limitations that "the organizing rules specify node-specific organizing criteria for a multi-level index". No discussion of these limitations of Claims 15 and 16 is provided in the Office Action; however, col. 4, lines 32 - 41 are cited with reference to Claim 7 as teaching the multi-level index. Applicants respectfully submit that this cited text from Meffert pertains to specifying conditions/requirements

that "form an organizational unit called a folder that is used as the basic unit for inquiry ...". That

is, a query is being formed. There is no teaching that the conditions/requirements are node-

specific, as in Applicants' Claims 15 and 16, or that they create a multi-level index.

Applicants therefore respectfully submit that their independent Claims 1, 15, and 16 are

patentable over Meffert.

Applicants also respectfully disagree with interpretations of Meffert as applied to their

dependent claims.

- As one example, Applicants' Claims 8 and 9 both specify that organizing rules are applied,

  and a result thereof is rendered; Claim 8 specifies that the applying and rendering are

  "upon occurrence of a new electronic object" and Claim 9 specifies that the application

  and rendering occur "upon modification of the organizing rules". The cited text in col. 4,

  lines 50 - 52 and col. 5, lines 18 - 21 pertains only to user-driven repeated steps. This is

  distinct from both "upon occurrence of a new electronic object" (as in Claim 8) and "upon

  modification of the organizing rules" (as in Claim 9).

- As another example, Claim 12 (as amended) specifies "one or more images as organizing

  criteria". The cited text in col. 3, lines 15 - 18 pertains to relationships between files that

  include "electronic versions of images of documents", but there is no teaching that the

  images themselves are "organizing criteria", as in Applicants' Claim 12.

However, Applicants respectfully submit that their dependent claims are patentable over Meffert

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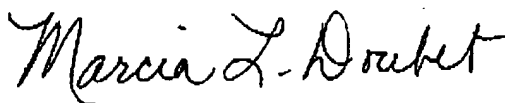
by allowability of the independent claims from which they depend, and these disagreements are therefore deemed moot.

In view of the above, the Examiner is respectfully requested to withdraw the §102(b) rejection of all claims.

IV.   Conclusion

Applicants respectfully request reconsideration of the pending rejected claims, withdrawal of all presently outstanding objections and rejections, and allowance of all claims at an early date.

Respectfully submitted,

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Attachment: Replacement Sheet (1)

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